

Approved  
/s/ Robert M. Levy

7/25/15

### INITIAL CONFERENCE QUESTIONNAIRE

CASE NAME: Payamps v. Khalil Deli + Grocery Inc. et al. DOCKET NO.: 15-CV-1308

1. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure, if not yet made: 7/23/2015
2. If additional interrogatories beyond the 25 permitted under Rule 33(a) of the Federal Rules of Civil Procedure are needed, the maximum number by:  
plaintiff(s) 0 and defendant(s) 0
3. Maximum number of requests for admission by: plaintiff(s) 25 and defendant(s) 25
4. Number of depositions by plaintiff(s) of: parties \_\_\_\_\_ non-parties 4 total
5. Number of depositions by defendant(s) of: parties \_\_\_\_\_ non-parties 4 total
6. Time limits for depositions: 7 hrs.
7. Date for completion of factual discovery: 11/20
8. Number of expert witnesses of plaintiff(s): 0 medical 0 non-medical  
Date for expert report(s): 10/21
9. Number of expert witnesses of defendant(s): 0 medical 0 non-medical  
Date for expert report(s): 10/21
10. Date for completion of expert discovery: 11/20
11. Time for amendment of the pleadings by plaintiff(s) 7/30  
or by defendant(s) 7/30
12. Number of proposed additional parties to be joined by plaintiff(s) 0 and by  
defendant(s) \_\_\_\_\_ and time for completion of joinder: \_\_\_\_\_
13. Types of contemplated dispositive motions: plaintiff(s): SJ  
defendant(s): SJ
14. Dates for filing contemplated dispositive motions: plaintiff(s): 12/21/2015  
defendant(s): 12/21/2015
15. Have counsel reached any agreements regarding electronic discovery? If so, please describe  
at the initial conference.

The parties believe that no separate agreement on ESI  
discovery will be necessary.

16. Will the parties \*consent to trial before a magistrate judge pursuant to 28 U.S.C. §636?  
(Answer no if any party declines to consent without indicating which party has declined.)  
Yes ☐ No ☒
17. This case should be ordered to arbitration at the close of discovery No (yes/no)
18. This case should be ordered to mediation (now or at a later date) No (yes/no)  
(Prior to the Initial Conference, counsel shall discuss with their clients and their adversaries whether arbitration or mediation is appropriate in this case and be prepared to explain their reasons to the court)

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\* The fillable consent form AO 85 may be found at [https://www.nyed.uscourts.gov/forms/all-forms/general\\_forms](https://www.nyed.uscourts.gov/forms/all-forms/general_forms) and may be filed electronically upon completion prior to the initial conference, or brought to the initial conference and presented to the Court for processing.